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July 15, 2013

Honorable A. Kathleen Tomlinson
U.S. Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: JACKSON v. COUNTY OF SUFFOLK, et. al.
Docket No.: CV-12-01455

Dear Judge Tomlinson:

As your records reflect, I am the attorney representing Shanta Jackson, as administrator of the Estate of Willie Jackson, in the case pending in the Eastern District of New York against the County of Suffolk and several individuals, officers and officials. I respectfully submit this letter to request leave to amend Plaintiff's Motion for Sanctions and leave to extend the number of pages in the Motion to 34 pages.

In order to properly address the issue of severe sanctions against the Defendants in Plaintiff's Memorandum of Law, I originally had 34 pages of text. However, to be compliant with your limit of 20 pages, I had to cut huge sections of text with case law and facts.

I request leave of Court to Amend the Motion for Sanctions to include the important case law and facts that were excluded. I request permission to extend the limit of 20 pages to 34 pages.

I communicated with Megan O'Donnell, Defendants' counsel, via e-mail today. She states that she has not read the motion and is unable to consent. She is out of the office until next week. She will not be able to review the motion until next week. She states she will rely on the Court's discretion in regard to the Plaintiff's applications.

Further, Ms. O'Donnell and I are seeking guidance from the Court as to whether the Court requires a status letter.

Sincerely,


Tarsha C. Smith, Esq.

Cc:

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